

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ARCHITECTURAL IRON WORKERS' LOCAL	)	
NO. 63 WELFARE FUND, ARCHITECTURAL	)	
IRON WORKERS' LOCAL NO. 63 DEFINED	)	
CONTRIBUTION PENSION FUND, and the	)	
ARCHITECTURAL METAL TRAINEE SCHOOL	)	
FOR LOCAL NO. 63 AND THE IRON LEAGUE OF	)	Case No.: 13 CV 2000
CHICAGO, INC.	)	
	)	Judge: Durkin
	)	Magistrate Judge: Keys
ARCHITECTURAL and ORNAMENTAL IRON	)	
WORKERS' UNION LOCAL NO. 63,	)	
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
SECURITY INDUSTRIES, INC. and DANNY JONES,	)	
Individually,	)	
	)	
Defendants.	)	

**Agreed Motion for Entry of Agreed Judgment Order**

Plaintiffs, by its attorneys, Michael J. McGuire and Gregorio & Associates, move this Honorable Court to enter an Agreed Judgment Order against the Defendant, SECURITY INDUSTRIES, INC., and in support states as follows:

1. Plaintiffs filed their amended Complaint on April 22, 2013 alleging that the Security Industries, Inc, and Danny Jones failed to fringe benefits contributions to the Plaintiff Trust Funds.
2. The parties now have reached an agreement to resolve all matters in dispute. Pursuant to agreement, Defendant Danny Jones will be dismissed from the action and an agreed Judgment will be entered against the corporate defendant, Security Industries, Inc.

3. Security Industries, Inc. and the Plaintiffs have agreed to have a Judgment entered against Security Industries, Inc. in the total amount of \$53,208.50 representing \$35,513.33 in unpaid fringe benefit contributions, \$7,102.67 in liquidated damages, and \$10,592.50 in attorney fees which are collectable under the terms of the Collective Bargaining Agreement, Trust Agreements and Federal law (29 U.S.C. Section 1132(g)(2)(b)). A copy of the proposed Agreed Judgment Order is attached as **Exhibit 1**.

WHEREFORE, Plaintiffs and Defendant, Security Industries, Inc. request that this Court enter an Agreed Judgment Order in the amount of \$53,208.50 against the Defendant, Security Industries, Inc.

By: /s:/Michael J. McGuire  
Michael J. McGuire  
One of the Attorneys for Plaintiffs

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